

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**Master File No. 1:00-1898
MDL NO. 1358 (SAS)
M21-88**

In re: Methyl Tertiary Butyl Ether ("MTBE")
Products Liability Litigation

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This Document Relates To:

*City of Riverside v. Atlantic Richfield Company, et
al.*, S.D.N.Y. No. 04- Civ. 4969 (SAS)

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**PLAINTIFF CITY OF RIVERSIDE'S PRELIMINARY DISCLOSURE OF SOURCES
OF MTBE CONTAMINATION**

Pursuant to Case Management Order No. 68, Plaintiff City of Riverside hereby makes the following preliminary disclosure of sources of MTBE¹ contamination in Plaintiff's wells. This initial disclosure is made with the following reservations expressly stated:

1. Discovery in this matter is ongoing. Plaintiff may discover that additional stations/facilities are substantial factors in causing MTBE contamination in Plaintiff's wells and Plaintiff reserves the right to supplement or amend this list accordingly.
2. Plaintiff reserves all rights to supplement or amend this disclosure.
3. By making this disclosure, Plaintiff is in no way representing that all of the sources of MTBE in Plaintiff's wells are identified below. There may be orphan plumes emanating from fugitive tanks, surface spills or other unaccounted for sources that are not discoverable based on a reasonable investigation.
4. This disclosure is made upon information reasonably available from publicly available

¹ As used herein "MTBE" refers to methyl tertiary butyl ether and its degradation byproducts including tertiary butyl alcohol.

sources. Plaintiff hereby reserves the right to supplement or amend this disclosure as a result of obtaining additional information as it prepares for trial.

5. Expert discovery has not yet commenced. Plaintiff hereby reserves the right to supplement or amend this disclosure as a result of the expert discovery process.
6. Expert disclosures are not due yet. This disclosure is not and is in no way intended to be an expert disclosure.

Subject to and without waiving the limitations and reservations set forth above, Plaintiff hereby responds as follows:

Site Name²	Address	City
ARCHER -JC LLC	208 WATERMAN AVE NORTH	SAN BERNARDINO
ARCO #5181	572 S MOUNT VERNON AVE	SAN BERNARDINO
ARCO #5214	305 REDLANDS BLVD	SAN BERNARDINO
ARCO #5267	495 S WATERMAN AVE	SAN BERNARDINO
ARCO #6144	22895 W WASHINGTON ST	COLTON
ARCO #6144	1240 WASHINGTON STREET	COLTON
ARCO #6227	702 W 2ND ST	SAN BERNARDINO
ARCO TANK FARM	2395 RIVERSIDE AVENUE S	COLTON
BEAR OIL CO./ FORMER TEXACO	24913 REDLANDS BLVD	LOMA LINDA
BONADIMAN-MCCAIN INC	280 S. LENA RD	SAN BERNARDINO
CA DEPT. OF TRANS GARAGE	247 W 3RD ST	SAN BERNARDINO
CHEVRON #9-2789	24910 W REDLANDS BLVD	LOMA LINDA
CHEVRON #9-9125	1198 S E ST	SAN BERNARDINO
CIRCLE K	2505 S WATERMAN AVE	SAN BERNARDINO
CIRCLE K #0498	25403 REDLANDS BLVD	LOMA LINDA

² Please note that certain locations may have undergone name changes and/or may have been converted to different uses. These names are provided for convenience and should not be read as a limitation.

CRAFTON MOTORS (FORMER)	25694 REDLANDS BLVD	LOMA LINDA
D. A. MITCHELL COMPANY	24230 BARTON RD	LOMA LINDA
EQUILON ENTERPRISES/ SHELL	1973 TIPPECANOE BLVD	SAN BERNARDINO
FOOD N FUEL	2649 S WATERMAN AVE	SAN BERNARDINO
FORMER E-Z SERVE FACILIT Y #100779	847 E VALLEY BLVD	COLTON
FRANK'S FENCE	1145 S WATERMAN AVE	SAN BERNARDINO
G & M OIL SS #67	187 N F ST	SAN BERNARDINO
GALLAGHER BEAUTY & BARBER SUPP	190 S ARROWHEAD AVE	SAN BERNARDINO
GAS PLUS	1266 E ST SOUTH	SAN BERNARDINO
GAS STATION (FORMER MUFFLER SHOP)	108 E 3RD ST	SAN BERNARDINO
GENERAL SERVICES AGENCY	777 E RIALTO AVE	SAN BERNARDINO
HOLIDAY OLDSMOBILE	1388 S E ST	SAN BERNARDINO
INLAND BEVERAGE COMPANY	223 S G ST	SAN BERNARDINO
LOMA LINDA OIL COMPANY	1880 MOUNTAIN VIEW AVE	LOMA LINDA
MATLOCK TRANSPORTATION	550 E CAROLINE ST	SAN BERNARDINO
MIDWAY GARAGE	24732 REDLANDS BLVD	LOMA LINDA
MOBIL #18-ARM	807 MILL ST	SAN BERNARDINO
MOBIL #18-HPH	520 ORANGE SHOW RD	SAN BERNARDINO
MONTECITO MORTUARY	24145 BARTON RD	COLTON
MORRISON HOPE, INC.	205 S ARROWHEAD AVE	SAN BERNARDINO
NEVADA INVESTMENT HOLDINGS(ALAMEDA MANAGEMENT #512	499 ORANGE SHOW RD	SAN BERNARDINO
ONE DAY PAINT & BODY	288 S E ST	SAN BERNARDINO
ORBIT STATIONS INC.	908 TIPPECANOE AVE	SAN BERNARDINO
P AND M STATION #937	501 INLAND CENTER DR	SAN BERNARDINO
RETAIL DELIVERY SYSTEMS (CORNELL CARTHAGE)	737 COLLEGE DR	SAN BERNARDINO
RIVERSIDE HIGHLAND WATER CO.	1450 E WASHINGTON ST	COLTON

S AND G ROOFING SUPPLY INC.	1444 TIPPECANOE AVE	SAN BERNARDINO
SAN BERNARDINO CO. VEHICLE SER	825 E 3RD ST	SAN BERNARDINO
SAN BERNARDINO FIRE STN. #10	502 S ARROWHEAD AVE	SAN BERNARDINO
SAN BERNARDINO WATER DEPT.	195 N D ST	SAN BERNARDINO
SHELL #10359	10359 TIPPECANOE AVE	SAN BERNARDINO
SHELL #1930	1930 S WATERMAN AVE	SAN BERNARDINO
SHELL SERVICE STATION	505 ORANGE SHOW ROAD	SAN BERNARDINO
SHELL STATION	907 MILL STREET WEST	SAN BERNARDINO
SHELL STATION	1930 WATERMAN AVENUE	SAN BERNARDINO
SIRION PRINTING INK, CO.	730 S LUGO AVE	SAN BERNARDINO
SOIL TREATMENT, SAN BERNARDINO	TIPPECANOE AVE, NORTH OF SAN BERNARDINO RD., WEST OF RIVERVIEW DRIVE	SAN BERNARDINO
SOIL TREATMENT, SAN BERNARDINO	1880 E. RIVERVIEW DR.	SAN BERNARDINO
SOUTHERN CALIFORNIA EDISON CO.	25770 SAN BERNARDINO AVE	SAN BERNARDINO
SOUTHERN CALIFORNIA GAS CO.	155 S G ST	SAN BERNARDINO
SUPPORT SERVICES BUILDING	1333 TIPPECANOE AVE	SAN BERNARDINO
TERMINAL STATIONS, INC.	2300/23659 STEEL RD	COLTON
TEXACO SERVICE STATION	797 W 2ND ST	SAN BERNARDINO
TFI APPLIANCE SERVICE	941 INLAND CENTER DRIVE	SAN BERNARDINO
THRIFTY OIL #345	1945 TIPPECANOE AVE	SAN BERNARDINO
TOSCO/ 76 STATION #4975 (#30776)	1950 S WATERMAN AVE	SAN BERNARDINO

TURNER STORAGE	24779 REDLANDS BLVD	LOMA LINDA
U.S. POST OFFICE	1341 S E ST	SAN BERNARDINO
U-HAUL CENTER OF CENTRAL CITY	110 S D ST	SAN BERNARDINO
UNOCAL #2281	300 W 3RD ST	SAN BERNARDINO
UNOCAL #2417	24891 W REDLANDS BLVD	LOMA LINDA
UNOCAL #6968	187 N F ST	SAN BERNARDINO
VALLEY GAS / AUTO REPAIR	1195 S WATERMAN AVE	SAN BERNARDINO
VIKING TIRE	747 W RIALTO AVE	SAN BERNARDINO

Dated: San Francisco, California
June 7, 2010

/s/ NICHOLAS G. CAMPINS
VICTOR M. SHER (*pro hac vice*)
NICHOLAS G. CAMPINS (*pro hac vice*)

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Attorneys for Plaintiff City of Riverside

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of **PLAINTIFF CITY OF RIVERSIDE'S PRELIMINARY DISCLOSURE OF SOURCES OF MTBE CONTAMINATION** was served on Liaison Counsel via Electronic Mail, and on all counsel of record by posting it directly to CM/ECF and LexisNexis File & Serve on the 7th day of June, 2010.

_____*BEVERLY SANTOS*_____
BEVERLY SANTOS